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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

YUSEF D. HAIRSTON,

Defendant.

Case: 4:23-cr-20474
Judge: Kumar, Shalina D.
MJ: Ivy, Curtis
Filed: 08-16-2023
INDI USA v. Yusef D. Hairston (tt)

Violations:
18 U.S.C. § 922(a)(4)
18 U.S.C. § 922(o)
18 U.S.C. § 933(a)(1)

INDICTMENT

THE GRAND JURY CHARGES:

F / L E
AUG 16 2023
U.S. DISTRICT COURT
FLINT, MICHIGAN

COUNT ONE

ILLEGAL POSSESSION AND TRANSFER OF A MACHINEGUN
18 U.S.C. § 922(o)

On or about June 8, 2023, in the Eastern District of Michigan, YUSEF D. HAIRSTON knowingly possessed and transferred a machinegun, that is, eleven machinegun conversion devices, also known as "Glock switches," a part designed and intended solely and exclusively to convert a firearm to shoot automatically more than one shot, without manual reloading, by a single function of the trigger, in violation of Title 18, United States Code, Section 922(o).

COUNT TWO
ILLEGAL TRAFFICKING IN FIREARMS
18 U.S.C. § 933(a)(1)

On or about the June 8, 2023, in the Eastern District of Michigan, YUSEF D. HAIRSTON knowingly shipped, transported, transferred, cause to be transported, or otherwise disposed of a firearm, that is, eleven machinegun conversion devices, also known as “Glock switches,” to Individual-1 in or otherwise affecting commerce, knowing or having reasonable cause to believe that the use, carrying, or possession of the firearm by Individual-1 would constitute a felony, in violation of Title 18, United States Code, Section 933(a)(1).

COUNT THREE
TRANSPORTING PROHIBITED WEAPONS WITHOUT A LICENSE
18 U.S.C. § 922(a)(4)

On or about June 27, 2023, in the Eastern District of Michigan and elsewhere, YUSEF D. HAIRSTON, not being a licensed dealer, importer, manufacturer, and collector of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly transported and caused to be transported in foreign commerce from the People’s Republic of China to the United States, a machinegun, as defined in 26 U.S.C. § 5845(b), that is, fifty-one machinegun conversion devices, also known as “Glock switches,” without the specific authorization of the Attorney General, in violation of Title 18, United States Code, Sections 922(a)(4) and 924(a)(1)(B).

COUNT FOUR
ILLEGAL POSSESSION AND TRANSFER OF A MACHINEGUN
18 U.S.C. § 922(o)

On or about July 21, 2023, in the Eastern District of Michigan, YUSEF D. HAIRSTON knowingly possessed and transferred a machinegun, that is, fifty-one machinegun conversion devices, also known as “Glock switches,” a part designed and intended solely and exclusively to convert a firearm to shoot automatically more than one shot, without manual reloading, by a single function of the trigger, in violation of Title 18, United States Code, Section 922(o).

COUNT FIVE
ILLEGAL TRAFFICKING IN FIREARMS
18 U.S.C. § 933(a)(1)

On or about the July 21, 2023, in the Eastern District of Michigan, YUSEF D. HAIRSTON knowingly shipped, transported, transferred, cause to be transported, or otherwise disposed of a firearm, that is, fifty-one machinegun conversion devices, also known as “Glock switches,” to Individual-1 in or otherwise affecting commerce, knowing or having reasonable cause to believe that the use, carrying, or possession of the firearm by Individual-1 would constitute a felony, in violation of Title 18, United States Code, Section 933(a)(1).

THIS IS A TRUE BILL.

Dated: August 16, 2023

s/GRAND JURY FOREPERSON

DAWN N. ISON
United States Attorney

s/ANTHONY P. VANCE
ANTHONY P. VANCE
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P61148

Companion Case information MUST be completed byUnited States District Court
Eastern District of Michigan**Criminal Case C**

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to

Case: 4:23-cr-20474
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Companion Case Information	Companion Case Number: 23-CR-20414
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned: F. KAY BEHM
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	AUSA's Initials: TV

Case Title: USA v. YUSEF D. HAIRSTON**County where offense occurred :** GENESEE**Check One:** **Felony** **Misdemeanor** **Petty**

- Indictment/____ Information --- no prior complaint.
 Indictment/____ Information --- based upon prior complaint [Case number: 23-mj-30310-1]
 Indictment/____ Information --- based upon LCrR 57.10 (d) [*Complete Superseding section below*].

Superseding Case Information**Superseding to Case No:** _____ **Judge:** _____

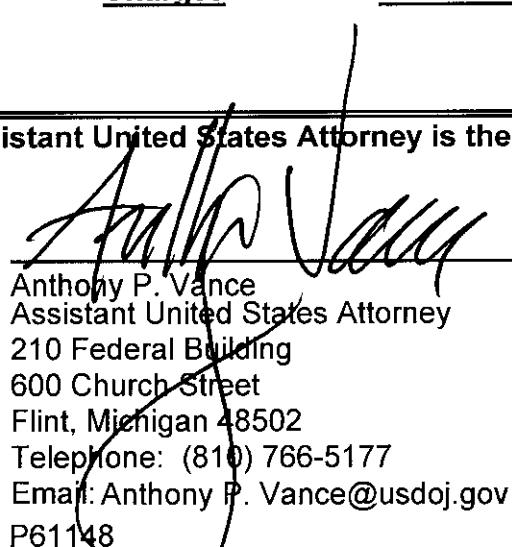
- Original case was terminated; no additional charges or defendants.
- Corrects errors; no additional charges or defendants.
- Involves, for plea purposes, different charges or adds counts.
- Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
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Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

8/16/2023

Date



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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.